

**REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Quinn Dejaun & Janelle Lynea Brown Case No. 20 B 02109 Chapter 13

All Cases: Moving Creditor Estates at Brookmere Owners Association Date Case Filed January 24, 2020

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismiss

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed July 16, 2020

Chapter 7: No-Asset Report Filed on _____
No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

- a. ☒ Home 152 Henson Court, Matteson, Illinois
b. Car Year, Make and Model _____
c. Other (describe) _____

2. Balance Owed as of Petition Date \$3,614.17 Includes Fees and Costs.
Total of all other Liens against Collateral \$302,418.00 Per Debtor(s) Schedule D.

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$308,000.00 Per Debtor(s) Schedule A

5. Default

- a. ☒ Pre-Petition Default
Number of months 11+ Amount \$ 3,614.17
b. ☒ Post-Petition Default
i. ☒ On direct payments to the moving creditor
Number of months 13+ Amount \$ 2,430.00
ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. Lack of Adequate Protection § 362(d)(1)
i. No insurance
ii. Taxes unpaid Amount \$ _____
iii. Rapidly depreciating asset
iv. ☒ Other (describe) Failure to pay association assessments, fees, and costs
b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
c. Other "Cause" § 362(d)(1)
i. Bad Faith _____
ii. Multiple filings _____
iii. Other (describe) _____
d. Debtor's Statement of Intention regarding the collateral
i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention Filed

Date: July 1, 2022

/s/ Ronald J. Kapustka
Counsel for Movant

(Rev. 12/21/09)

NOTE: Pursuant to the Fair Debt Collection Practices Act you are advised that this law firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.